

1 Rene L. Valladares  
2 Federal Public Defender  
3 Nevada State Bar No. 11479  
4 \*Amelia L. Bizzaro  
5 Assistant Federal Public Defender  
6 Wisconsin State Bar No. 1045709  
7 411 E. Bonneville Ave., Ste. 250  
8 Las Vegas, Nevada 89101  
9 (702) 388-6577  
10 Amelia\_Bizzaro@fd.org

11 \*Attorney for Petitioner Gladys Perez

12 UNITED STATES DISTRICT COURT  
13 DISTRICT OF NEVADA

14 Gladys Perez,

15 Petitioner,

16 v.

17 Dwight Neven, Warden, *et al.*,

18 Respondents.

Case No. 2:14-cv-02087-APG-BNW

**Joint Stipulation**

**ORDER**

1 Petitioner Gladys Perez, by Assistant Federal Public Defender Amelia L.  
2 Bizzaro, and Respondents Dwight Neven, et al., by Deputy Attorney General  
3 Jessica Perlick, file this Joint Stipulation following the February 28, 2020, hearing  
4 and this Court's March 2, 2020 Order. Counsel met and conferred by telephone on  
5 March 4, 2020 and propose the following schedule:

- 6 1. Discovery in this case must be completed by **April 6, 2020**.
- 7 2. The Petitioner must file and serve a memorandum of points and  
8 authorities addressing only the equitable tolling issue, and, as  
9 confirmed at the February 28th hearing, the relation back issue as it  
10 relates to the Ninth Circuit's recent *en banc* decision in *Ross v.*  
11 *Williams*, \_\_ F.3d \_\_, 2020 WL 878518 (Feb. 24, 2020) by **May 6, 2020**.
- 12 3. The Respondents may file a response memorandum within **14 days**  
13 after service of Perez's memorandum.
- 14 4. This Court will reinstate the Respondent's Motion to Dismiss (ECF No.  
15 34) and the Petitioners' Motion for Evidentiary Hearing (ECF No. 111)  
16 and issue a comprehensive ruling.

17 Dated March 5, 2020.

18 Respectfully submitted,


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20 Rene L. Valladares  
21 Federal Public Defender

Aaron D. Ford  
Attorney General

22 /s/ Amelia L. Bizzaro  
23 Amelia L. Bizzaro  
24 Assistant Federal Public Defender  
Counsel for Michael L. Baker

/s/ Jessica Perlick  
Jessica Perlick  
Senior Deputy Attorney General  
Counsel for Renee Baker, et al.

25 **IT IS SO ORDERED.**

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UNITED STATES DISTRICT JUDGE  
Dated: March 5, 2020.